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March 11, 2024

The Honorable Sarah Netburn
United State Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: *United States v. Taylor Cascio*, Case No.: 1:22-mj-9601-UA
Motion to Request Leave to Seal the Joint Status Report and *Ex Parte* Letter**

Dear Judge Netburn:

We represent Taylor Cascio in the above-captioned action. As directed by the Court's March 1, 2024, Order (ECF No. 22), the parties intend to file later today a letter addressed to Your Honor with a joint report on "the status of this case and [to] propose an appropriate course forward." (ECF No. 22). In conjunction with that letter, and with the consent of the Government, the undersigned defense counsel would separately file an *ex parte* letter to Your Honor addressing in greater detail certain issues concerning the history of our representation of Mr. Cascio, given the ineffective assistance of counsel issues raised to the Court by Mr. Cascio.

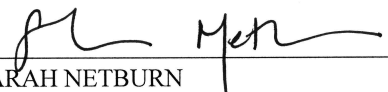
Accordingly, we write with the consent of the Government to jointly request leave to file both the joint status letter responding to the Court's March 1, 2024, Order and the aforementioned *ex parte* letter under seal in light of the sensitive information addressed therein. More specifically, both letters address Mr. Cascio's mental health and cite and summarize Magistrate Judge James L. Cott's sealed order dated May 19, 2023, which made certain findings concerning Mr. Cascio's capacity and ability to properly assist counsel in his defense.

For the foregoing reasons, we respectfully request leave of the Court to file the aforementioned letters under seal.

Respectfully submitted,

/s/ John M. Hillebrecht
John M. Hillebrecht
Counsel for the Defendant

SO ORDERED.



SARAH NETBURN
United States Magistrate Judge

DATED: March 11, 2024
New York, New York